

documents. (Doc.286.) On December 6, 2019, in compliance with the Court's Order, Defendants submitted briefing, proposed redactions, and justifications for continued sealing of the provisionally unsealed records. (Doc.291.)

At the time of the filing of this Motion, the Court has not ruled on the redactions and justifications for continued sealing submitted by Defendants on December 6, 2019. (Doc.291.) Accordingly, to the extent the proposed redacted information and documents that Defendants contend should remain continuously sealed are also part of the Defendants' instant Motion for Summary Judgment, the publicly filed Motion and related filings are redacted in conformity with Defendants' December 6, 2019, submission to the Court. (*Id.*)

Redacted versions of Defendants' instant Brief in Support of Motion for Summary Judgment, Statement of Undisputed Material Facts, and Exhibits, all filed contemporaneously herewith, mirror the color-coded redactions and justifications for continued sealing contained within Document 291 filed by Defendants on December 6, 2019. (*Id.*) A color-coded redaction key is attached hereto as Exhibit 1. Defendants will separately serve the Court and Plaintiffs' counsel with non-redacted versions of all filings related to the within Motion for Summary Judgment.

For the reasons set forth in Defendants' Memorandum of Law in Support of Motion for Summary Judgment, the provisions of which are incorporated herein by

reference, this Court should grant Defendants' Motion, and enter summary judgment in Defendants' favor on all of Plaintiffs' remaining claims.

Respectfully submitted,

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Dated: December 17, 2019

Counsel for Defendants

CERTIFICATE OF NON-CONCURRENCE

Pursuant to Local Rule 7.1, undersigned counsel certifies that he sought concurrence for the Motion from Plaintiffs, and that it has not been granted.

Dated: December 17, 2019

/s/ Jarad W. Handelman
Jarad W. Handelman, Esquire

CERTIFICATE OF SERVICE

I, Jarad W. Handelman, Esquire, hereby certify that I caused the foregoing to be served via ECF upon all counsel of record, including:

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